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Unforgettable Coatings, Inc.
8 *Unforgettable Coatings of Idaho LLC*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JOSE ISMAEL ZUNIGA, on behalf of himself
and all others similarly situated,

12 Plaintiff,

13 vs.

14 UNFORGETTABLE COATINGS INC.;
15 UNFORGETTABLE COATINGS OF IDAHO
LLC; DOES 1 through 50; inclusive.

16 Defendants.

17 Case No.: 2:21-cv-01221-JCM-VCF

**STIPULATION TO EXTEND DEADLINE
FOR DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(FIFTH REQUEST)

18 IT IS HEREBY STIPULATED by and between Plaintiff Jose Ismael Zuniga, ("Plaintiff"),
19 through his counsel, Gabroy Law Offices, and Defendants, Unforgettable Coatings, Inc. and
20 Unforgettable Coatings of Idaho, LLC, ("Defendants"), by and through their counsel, Jackson
21 Lewis P.C., that Defendants shall have an extension up to and including November 8, 2021, in
22 which to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and
23 based upon the following:

24 1. Plaintiff filed his Complaint on May 25, 2021 in the Eighth Judicial District Court
25 of Clark County, Nevada, Case No. A-21-835257-C. The Summons and Complaint were served
26 on or about June 8, 2021.

27 2. Defendants' filed their Petition for Removal of Civil Action from State Court on
28 June 29, 2021.

3. Defendants' Answer is currently due October 7, 2021.

4. This is the fifth request for an extension of time for Defendants to file a response to Plaintiff's Complaint.

5. The parties are discussing a potential resolution of Plaintiff's claims, which would render any such response unnecessary.

6. This request is made in good faith and not for the purpose of delay.

7. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

9 Dated this 6th day of October, 2021.

JACKSON LEWIS P.C.

/s/ Kaine Messer
12 Christian Gabroy, State Bar No. 8805
13 Kaine Messer, State Bar No. 14240
14 Dominique Bosa-Edwards, State Bar No. 15705
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/s/ Holly E. Walker
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15 | Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

Carl R. Schaefer

U.S. Magistrate Judge

Dated: 10-6-2021